## Response Update Corrective Action Plan (CAP): Audit Report #06DP-05 Data Center Review

## Department of Administration August 20, 2010

Agency	Recommendation #	Does this	CFDA#	Management	CAP – Corrective Action Plan	Person	Target Date
		affect a	(if	View		responsible for	
		federal program?	previous YES)			CAP	
61010	Recommendation #1	No	TLS)	Concur	A. The currently-fragmented		
DOA	We recommend the Department of	110		Concu	inventories of equipment, systems		
DOA	Administration (DOA) and the				and data will be consolidated,		
	Information Technology Services				updated and maintained.		
	Division:				Near-term: Centralized	Dave Harris	Completed
	Division.				Technical Services will address	Dave Hairis	9/30/2006
	A. Maintain and update the				the issues.		
	inventory of equipment, systems,				<b>Long-term:</b> the Configuration	Wendy	12/31/2010
	and data residing in the data center.				DB within ITSD's Service Mgmt	Wheeler	
					System will be the single		
					reference point for this		
					information. This effort will take		
					place after the initial move to the		
					Helena Data Center.		
	B. Coordinate with all agencies that				B. The Department will work	Dawn Pizzini	Completed
	have hosted systems in the data				with agencies on "Continuity of	Dawn 1 izziiii	Completed
	center to rank the system's				Government (COG)/Continuity of		
	criticality and establish a priority				Operations (COOP)" plans, and		
	for the order in which systems will				will pay particular attention to		
	be brought back up.				their recovery plan for critical		
	be brought back up.				systems residing in the data		
					center. This ongoing process has		
					been defined and agencies are		
					participating.		
					participating.		

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					The "48 hour" plan was replaced by the development of the COOP/COG plans. The COG plan is in place and the Continuity Management Plan is under development. Ongoing COOP planning is in process with the agencies.	Dawn Pizzini	Completed
	<ul><li>C. Evaluate existing threats to the data center including the potential impact or harm.</li><li>D. Conduct a cost analysis</li></ul>				C. The Department will conduct a threat and impact assessment for the data center by participating in the Capitol complex vulnerability assessment scheduled for July	Pat Boles	Completed 8/31/2006
	associated with implementing or improving controls.				D. The state legislature approved funding to build a replacement data center for the State of Montana. This facility is being constructed as a Tier III data center with a significant focus on security. The location of the new data center was selected for a number of security reasons. All specific risks identified regarding the data center in the Mitchell building will no longer be relevant.	Lynne Pizzini	Completed 01/01/2010
					Construction of the new Helena Data Center is complete. Systems are being moved and all will be housed in the new data center by	Lynne Pizzini	12/13/2010

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	E. Define the responsibility for, and coordinate with agencies to utilize the existing software package to develop disaster recovery plans.				December 31, 2010.  E. The Department will clarify and communicate its responsibilities to its staff and other stakeholders as follows:  The General Services Division (GSD) is responsible for coordination of agency disaster recovery planning.  The Information Technology Services Division (ITSD) provides software support for the program. The Department has prepared an EPP for support of this software in the upcoming budget cycle.	Sheryl Olson	Completed 7/1/2006  EPP not approved for inclusion in the executive budget.
61010 DOA	Recommendation #2 We recommend the Department of Administration:  A. Implement safeguards such as locked doors in the Mitchell Building hallways or completed walls on the perimeter of the data center to restrict physical access to the data center.	No		Concur	A. ITSD installed a surveillance camera in room 54 and cameras in the UPS/NCC hallway, room 51 and the main raised floor area overlooking the SAN appliances. ITSD is in the process of implementing a monthly access log of access to this room.  ITSD completed an access audit of all badge readers to the raised floor area and has a proposal to diminish the frequency of unescorted access to this area.	Dick Clark  Dick Clark	Completed 8/29/2008 Completed 8/25/2008
	B. Implement procedures and assign responsibilities to ensure				B. The Department will implement a procedure that will	Mike Krings	<b>Completed</b> 11/30/2006

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	background checks are completed.				assure required background checks are performed for individuals and positions that handle sensitive information housed in the data center.		
	C. Follow policy and maintain required authorization documentation of file for each individual who has card access to the data center.				C. The Department will maintain card key authorization documentation as recommended.	Mike Krings	Completed
	D. Conduct a periodic review of all key card access to the data center to confirm appropriateness.				D. The Department will formalize the access card review frequency and process.	Mike Krings	<b>Completed</b> 8/31/2006
	E. Monitor and review the card key activity logs and data center visitor logs for inappropriate or unauthorized access.				E. The Department will review the logs as recommended. The Department will also establish and communicate guidelines for visitor access to the data center.	Mike Krings	<b>Completed</b> 7/15/2006
	F. Develop a system to ensure operator awareness of physical security breaches.				F. The Department will develop a system to ensure data center operators are alerted of physical security breaches.	Mike Boyer	<b>Completed</b> 2/28/2010
					A new software system is being implemented for the Mitchell Building as well as the new data center. This software will allow operators to monitor physical security and send notification		09/01/2010

Agency	Recommendation #	Does this affect a federal program?	CFDA # (if previous YES)	Management View	breaches. The SMDC has intrusion detection and video surveillance throughout. Door alarm alerts are directed to the EOC, which has video access. These components are being installed during the month of August 2010.	Person responsible for CAP	Target Date
61010 DOA	Recommendation #3 We recommend the Department strengthen safeguards to mitigate the risks associated with earthquake and water-related threats.			Concur	During the budget planning process for FY06-07, the Department submitted an EPP for earthquake dampening devices for data center equipment to provide protection during "non-catastrophic" earthquakes. That proposal did not survive the previous budget process. The Department will resubmit that EPP to provide a measure of earthquake protection ISO-Base cabinet seismic protection has been installed on all Helena SMDC cabinets to assure survival of the equipment within the "500-year seismic event" building.	Mike Boyer	Completed  Earthquake protection equipment was not included in HB2 when passed; however, the new buildings are engineered as "critical structures"
					The Department has installed new water-sensing and alert equipment in the data center.	Mike Boyer	Completed
61010 DOA	Recommendation #4 We recommend the Department: A. Maintain an updated statewide			Concur	A. GSD has oversight responsibility for the COG plan	Sheryl Olson	Completed 7/1/06

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	disaster recovery plan.				ITSD is responsible for developing and maintaining the disaster recovery plan for ITSD equipment and services.  Process has been established to accomplish the continual review and updating of disaster recover plans.	Lynn Pizzini	Completed
					ITSD is also responsible to provide technical support for the software tool used to develop and maintain COOP plans on a statewide basis. This ongoing process has been established and is underway with the state agencies.	Dawn Pizzini	Completed
	B. Coordinate with the Governor's office to request that agencies assign a higher priority to disaster recovery.				B. The Governor's office has placed a high priority on disaster recovery and set expectations for agency participation in COG/COOP planning efforts	Dick Clark	Completed
61010 DOA	We recommend the Department clearly define and designate responsibility for coordination of all aspects of data center security			Concur	ITSD and GSD established a protocol to control authorization of access to the data center that improves strength in the security center.	Dick Clark	<b>Completed</b> 1/2/2007